

Privacy statement

We would like to provide you with the following information to inform you about the processing of your personal data by HelloFresh SE (the “Company”) and the rights you are entitled to according to data protection law.

1. Who is responsible for data processing?

HelloFresh SE
Saarbrücker Straße 37a
10405 Berlin
Germany
phone: +49 (0) 30 208 483 168
email: cr@hellofresh.com

If you have any questions regarding the information contained herein, please contact our data protection officer. He can be contacted by e-mail or mail at the following address:

HelloFresh SE
data protection officer
Saarbrücker Straße 37a
10405 Berlin
Germany
email: datenschutz@hellofresh.com

2. What is the purpose and legal basis for processing your data?

We process your personal data in compliance with the GDPR, the German Federal Data Protection Act (BDSG), the German Stock Corporation Act (AktG) and all other relevant legal provisions.

2.1. Visits to our website

Whenever you visit our website, the browser used on your terminal device automatically sends information to the server of our website and temporarily stores it in a so-called log file. The following information is also recorded without your intervention and stored until it is automatically deleted:

- the IP address of the requesting Internet-enabled device,
- the date and time of access,
- the name and URL of the retrieved file,
- the website/application from which the access was made (referrer URL)
- the browser you use and, if applicable, the operating system of your Internet-capable computer and the name of your access provider.

The legal basis for the processing of the IP address is Article 6(1)(f) GDPR. Our legitimate interest follows from the purposes of data collection listed below.

The IP address of your terminal device and the other data listed above are used by us for the following purposes:

- to ensure the smooth establishment of connections,
- to ensure comfortable use of our website/application,
- to evaluate system security and stability.

2.2. Making contact

If you contact us by phone, e-mail, post or via the contact form on our website or if we contact you, we process your personal data, e.g. name, address, phone number and the content of the message. This information is processed exclusively for the purpose of responding to your request

The legal basis for the processing of the data described above is Art. 6 para. 1 lit. b) GDPR, insofar as this is connected with the initiation or fulfilment of a contract with you, or on the basis of Art. 6 para. 1 lit. f) GDPR, since we have a legitimate interest in corresponding with you on business matters.

2.3. Newsletter

You are also welcome to subscribe to our newsletter via our website.

In order to be sure that no mistakes were made when entering the email address, we use the so-called Double-Opt-In procedure: After you have entered your email address in the registration field, we will send you a confirmation link. Only when you click on this confirmation link will your email address be added to our distribution list. The processing of your electronic contact data at this point is based solely on your consent (Article 6 paragraph 1 lit. a) GDPR). You can revoke your consent at any time with effect for the future. To do so, simply send a brief note by e-mail to the e-mail address listed under 1. or click on the “Unsubscribe” button at the end of each newsletter. If you have provided us with your name in the course of registering for our newsletter, we will process this data on the basis of our legitimate interest (Art. 6 para. 1 lit. f) GDPR) in an appealing presentation of our newsletter and exclusively for personal contact within the newsletter.

We would like to point out that we will measure success and evaluate your user behavior when the newsletter is sent. For this evaluation, the e-mails sent contain so-called web beacons or tracking pixels. These are stored on our servers and provide us with information about when and how you access them. To perform these analyses, we link the data and web beacons to your e-mail address.

The data thus obtained enables us to tailor the newsletter to your individual interests. We record basic information such as opening rate, information about when you read our newsletter, which links you click on and conclude from this your personal interests. The legal basis for this data processing is your consent, Art. 6 Para. 1 S.1 lit. a) GDPR. You can revoke your consent at any time with effect for the future by clicking on the “Unsubscribe” button to unsubscribe from our newsletter.

2.4. Google reCaptcha

We use reCaptcha v2 on our website. reCaptcha is an offer from Google (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland) and serves to prevent abusive automated entries into web forms and thus to protect the technical systems of the host. The protection of our systems is our legitimate interest, Art. 6 para. 1 f) GDPR.

When you call up one of our websites in which reCaptcha is integrated, a connection to Google’s servers is established. A reCaptcha cookie will be set. Your IP address is then transmitted to Google.

Furthermore, reCaptcha collects the following data by means of “fingerprinting:”

- Browser plugins used
- Cookies set by Google in the last 6 months
- Number of mouse clicks and touches you have made on this screen
- CSS information for the page you have accessed
- Javascript objects
- Date
- Browser language

As far as personal data is transferred to Google in the USA, this is done under the EU-US Privacy Shield on the basis of the adequacy decision of the European Commission. You can download the certificate [here](#).

You may refuse the use of cookies and fingerprinting by selecting the appropriate settings on your browser. In this case, however, you may not be able to use the full functionality of this website.

The privacy statement and terms of use of Google can be found here: <https://www.google.com/policies/privacy/> and here: <https://policies.google.com/terms>.

2.5. Legal obligations

We also process personal data to implement the German Stock Corporation Act (Aktengesetz) and, where applicable, to meet other legal obligations (obligations to keep records under stock corporation, commercial or tax law).

3. Cookies

Due to the importance of data privacy and our commitment to transparency, you will find information about cookies, how we use them on our website, and what options you have if you prefer to disable these cookies – despite their benefits, below.

3.1. Types of cookies

Cookies required for technical reasons: Data that must be stored includes cookies, which are absolutely necessary for the features of a website to work. For example, this refers to the storage of log-in data or language selection by using so-called session cookies (which are deleted once the browser is closed).

Cookies not required for technical reasons: In contrast, text files that not only serve the functionality of the website, but also collect other types of data are regarded as unnecessary cookies. These include the following:

- Tracking cookies
- Targeting cookies
- Analytic cookies
- Cookies from social media websites

Necessary cookies may be set from the start, i.e. even **without the user's prior consent**. In contrast to this, website visitors must grant their consent before cookies store unnecessary data. Thus, it is generally recognized that the EU Cookie Directive requires a so-called opt-in solution for unnecessary cookies.

This is the difference between opt-out and opt-in:

- Opt-out: Cookies are set from the beginning. Users can only object to data storage retroactively.
- Opt-in: Cookies are not set from the start but only after users agree to their data being stored

3.2. Cookies used

Cookie	Description	Duration of storage	Classification
PHPSessionID	Standard session identification for PHP	Deleted once the browser is closed	Necessary
cookieaccepted	Cookie used to store consent to the cookie bar function, and thus to its being concealed in the respective view	10 days	Necessary

3.3. Google Tag Manager

In the interests of transparency, we would like to point out that we use the Google Tag Manager. The Google Tag Manager itself does not collect any personal data. The Tag Manager makes it easier for us to integrate and manage our tags. Tags are small code elements that are used to measure traffic and visitor behavior, to measure the impact of online advertising and social channels, to set up remarketing and approaching certain target audiences, and to test and optimize websites. We use the Tag Manager for the Google service Google Analytics. In case you have deactivated the service, the Google Tag Manager will take this deactivation into account. For more information about the Google Tag Manager, please see:

<https://www.google.com/intl/de/tagmanager/use-policy.html>.

3.4. Google Analytics

This website uses Google Analytics, a web analytics service provided by Google LLC, (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) subject to your consent. Google Ireland Limited, Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland, is responsible for users in the EU/EEA and Switzerland. The usage includes the operating mode Universal Analytics. This makes it possible to assign data, sessions and interactions across multiple devices to a pseudonymous User ID and thus to analyze a user's activities across devices.

Google Analytics uses cookies that enable analysis of your use of the website. The information generated by the cookie about your use of this website is usually transferred to a Google server in the USA and stored there. However, due to the activation of IP anonymization on this website, your IP address will be shortened by Google within member states of the European Union or in other signatory states to the Agreement on the European Economic Area. The full IP address is only transferred to a Google server in the USA and shortened there in exceptional cases.

Personal data is transferred to the USA under the EU-US Privacy Shield on the basis of the adequacy decision of the European Commission. You can download the certificate here:

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI>

The IP address transmitted by your browser within the framework of Google Analytics will not be merged with other data from Google. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on the website activities and to provide further services to the website operator in connection with the use of the website and the Internet.

The data sent by us and linked to cookies or user IDs (e.g. user ID) is deleted automatically after 14 months. Data whose retention period has been reached is automatically deleted once a month.

The legal basis for the data processing described here is your consent (§ 15 TMG in conjunction with Art. 4 No. 11 and Art. 7 GDPR). Once you have given your consent, you may revoke it at any time with effect for the future. If you wish to revoke your consent, simply change the settings in the cookie tool we provide on our website.

You can also prevent the storage of cookies by adjusting your browser software accordingly. Furthermore, you can prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) to Google and the processing of this data by Google by downloading and installing <https://tools.google.com/dlpage/gaoptout?hl=de>. This prevents the future collection of your data when you visit this website. To prevent Universal Analytics from collecting data across multiple devices, you must opt-out on all systems in use.

For more information about Google Analytics' terms of use and Google's privacy policy, please visit

<https://www.google.com/analytics/terms/de.html> or <https://policies.google.com/?hl=de>.

3.5. Browser settings

You can refuse to accept the storage of cookies by websites and applications on your terminal devices or adjust your browser settings. In the latter case, users receive a warning before cookies are stored. Users may also adjust their settings so that their browser either rejects all cookies or only those of third parties. Users can also delete cookies that were stored at an earlier point in time. Please note that the settings must be adjusted separately for each browser and on each device used. In the event that users do not want cookies to be used, we would like to point out that we regret not to be able to guarantee that our pages will work properly without the use of cookies. Without the use of cookies, some functions of the websites and applications may not be available or certain pages may not be displayed. Users can go directly to the manual or, if required, to the help function of the browser used by clicking on one of the following links.

[Chrome](#)

[Firefox](#)

[Internet Explorer Edge](#)

[Safari](#)

4. Will your data be transferred to a third country?

In order to comply with the above-mentioned purposes, it may be necessary for your personal data to be transferred outside the European Economic Area (EEA) for one of the above-mentioned purposes. If we transfer personal data to service providers or Group companies outside the EEA, the transfer will only take place if the third country has been confirmed by the EU Commission as having an adequate level of data protection or if other appropriate data protection guarantees (e.g. binding internal company data protection regulations or EU standard contract clauses) are in place.

5. What recipient categories will we pass your data on to, if necessary?

External service providers:

We sometimes rely on external service providers (e.g. IT service providers, marketing service providers) for the operation of

the website and related data processing. Contracted service providers will only receive personal data from the Company that is necessary in order to perform the contracted service and they will only process this data in accordance with the instructions given by the Company.

6. How long will your data be stored?

As a matter of principle, we anonymize your personal data or delete it when and to the extent that it is no longer required for the purposes stated herein, unless we are obliged to continue to store it on the basis of statutory proof and/or retention obligations (under the German Stock Corporation Act, the German Commercial Code, the German Fiscal Code or other legal provisions). Furthermore, we only retain personal data in individual cases if this is necessary in connection with claims asserted against our Company (statutory limitation periods of up to thirty years).

7. What are your rights under data protection law?

You can contact the data protection officer at the address specified in section 1 in order to request free-of-charge information about the data stored about you, the correction or deletion of your personal data, and the restriction of processing it. You also have the right to data portability. A request for data deletion may preclude the Company's statutory retention obligations.

Art. 15 GDPR: Right of access by the data subject

You have the right to receive information from us on the types of your personal data we process.

Art. 16 GDPR: Right to rectification

If your personal data is incorrect or incomplete, you are entitled to have any incorrect information rectified, or to have incomplete personal data completed.

Art. 17 GDPR: Right to erasure

Under the conditions of Art. 17 GDPR, you may request the erasure of your personal data. Your right to request erasure depends, among other things, on whether or not your personal data is still required by us to fulfil our legal or contractual obligations.

Art. 18 GDPR: Right to restriction of processing

Under the conditions of Art. 18 GDPR, you may request that the processing of your personal data be restricted.

Art. 21 GDPR: Right to object

You have the right to object to the processing of your data to safeguard the legitimate interests of the Company or of a third party:

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email: cr@hellofresh.com

If your particular situation gives rise to reasons that preclude this type of data processing, we will terminate this type of processing if we cannot prove that there are compelling reasons for processing that are worthy of protection and that outweigh the data subject's interests, rights, and freedoms; or if processing serves to assert, exercise, or defend legal claims.

Art. 7 para 3 GDPR: Right to withdraw consent

You have the right to withdraw your consent to the processing of your personal data at any time. The withdrawal of consent shall not affect the lawfulness of data processing carried out on the basis of the consent until the point in time it was withdrawn.

8. Do you have any complaints with regard to the handling of your data?

If you have any complaints regarding the processing of your personal data, you can contact the Company's Data Protection Officer, using the contact details provided at the beginning of this document in order to seek immediate clarification from the Company. Notwithstanding the above, you have the right to lodge a complaint with a competent data protection supervisory authority.

The information included in this document was last amended in: July 2020

If there are relevant changes, we will update this information and make it available on our website. In addition, we will check whether there is an obligation to notification in the event of any changes to this data protection information in individual cases and comply with any such notification obligation accordingly.